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HONORABLE WHITMAN L. HOLT

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re

EASTERDAY RANCHES, INC., *et al.*

Debtors.<sup>1</sup>

EASTERDAY RANCHES, INC. and  
EASTERDAY FARMS,

Plaintiffs,

v.

ESTATE OF GALE A. EASTERDAY  
(DECEASED), KAREN L. EASTERDAY,  
CODY A. EASTERDAY, AND DEBBY  
EASTERDAY

Defendants.

Chapter 11

Lead Case No. 21-00141-WLH11  
Jointly Administered

Adv. Pro. No. 21-80050 (WLH)

**NOTICE OF PLAINTIFFS'  
PROPOSED SCHEDULING  
ORDER**

<sup>1</sup> The Debtors along with their case numbers are as follows: Easterday Ranches, Inc. (21-00141) and Easterday Farms, a Washington general partnership (21-00176).

1       **PLEASE TAKE NOTICE** that, on November 17, 2021, the court held a status  
2 conference (the “Status Conference”) in the above-captioned adversary proceeding (the  
3 “Adversary Proceeding”). As set forth on the record at the Status Conference, the court  
4 (1) continued the status conference to December 2, 2021 at 11:00 a.m. (Pacific Time)  
5 and (2) ordered that the Plaintiffs and Defendants meet and confer regarding a  
6 scheduling order and either (a) file a stipulated scheduling order or (b) in the event the  
7 Plaintiffs and Defendants cannot agree on the terms of a consensual scheduling order,  
8 file competing scheduling orders by December 1, 2021 at 12:00 p.m. (Pacific Time).

9       **PLEASE TAKE FURTHER NOTICE** that the Plaintiffs and Defendants have  
10 met and conferred over electronic mail regarding a scheduling order and have been  
11 unable to reach an agreement. Accordingly, the Plaintiffs’ proposed scheduling order  
12 is attached hereto as **Exhibit A**.

13  
14 Dated: December 1, 2021

BUSH KORNFELD LLP

/s/ Thomas A. Buford, III

THOMAS A. BUFORD, III (WSBA 52969)

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*Attorneys for Plaintiffs*

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**Exhibit A**  
**Plaintiffs' Proposed Scheduling Order**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re  
EASTERDAY RANCHES, INC., *et al.*  
Debtors.<sup>1</sup>

Chapter 11  
Lead Case No. 21-00141-WLH11  
Jointly Administered

EASTERDAY RANCHES, INC. and  
EASTERDAY FARMS,  
Plaintiffs,  
v.  
ESTATE OF GALE A. EASTERDAY  
(DECEASED), KAREN L. EASTERDAY,  
CODY A. EASTERDAY, AND DEBBY  
EASTERDAY  
Defendants.

Adv. Pro. No. 21-80050 (WLH)

**[PROPOSED] SCHEDULING  
ORDER**

Upon consideration of each request of the above-captioned Plaintiffs and Defendants for the court to enter a scheduling order in the above-captioned adversary proceeding (Adv. Proc. No. 21-80050, the “Adversary Proceeding”),

**IT IS HEREBY ORDERED THAT:**

1. The following deadlines shall apply with respect to the Adversary Proceeding:

- a. ***December 8, 2021***: Plaintiff’s deadline to file an amended complaint (the “Amended Complaint”) and/or answer to the counterclaims asserted by the Defendants [Adv. Proc. Docket Nos. 14 and 15].

<sup>1</sup> The Debtors along with their case numbers are as follows: Easterday Ranches, Inc. (21-00141) and Easterday Farms, a Washington general partnership (21-00176).

- 1           b.     ***December 22, 2021:*** Defendants’ deadline to answer the Amended  
2                   Complaint.
- 3           c.     ***January 7, 2022:*** Close of written discovery. Written responses to  
4                   Interrogatories, Requests for Admissions, and Requests for Production  
5                   shall be due no later than 14 days from service thereof. All such documents  
6                   and responses may be served by electronic mail.
- 7           d.     ***February 4, 2022:*** Deadline to complete document production.
- 8           e.     ***February 25, 2022:*** Close of fact depositions.
- 9           f.     ***March 4, 2022:*** Deadline to identify testifying experts.
- 10          g.     ***March 18, 2022:*** Reports of testifying experts must be served.
- 11          h.     ***April 8, 2022:*** Close of expert depositions.
- 12          i.     ***7 days before Final Hearing:*** Pre-trial briefing must be filed and served.
- 13          j.     ***3 days before Final Hearing:*** Declarations with direct testimony of fact  
14                   and expert witnesses must be filed and served.
- 15          k.     ***April 18, 2022 at 9:30 a.m. (Pacific Time):*** In person trial begins and  
16                   continues day to day until complete (the “Final Hearing”).
- 17          2.     The parties may modify the discovery deadlines set forth herein by the  
18                   agreement of the Plaintiffs and Defendants without further court approval.
- 19          3.     The court shall retain exclusive jurisdiction with respect to all matters  
20                   arising from or related to the implementation of this order.

21  
22                                   /// END OF ORDER ///

1 Presented by:

2 /s/ Draft

3 THOMAS A. BUFORD, III (WSBA 52969)  
4 BUSH KORNFELD LLP

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